

**Illinois Commerce Commission
Pipeline Safety
Field Trip Report**

Operator: AMEREN ILLINOIS COMPANY	Operator ID#: 32513
Exit Meeting Contact: (Not Applicable)	Total Man Days: 0
Pipeline Safety Representative(s): Jim Watts	
Company Representative to Receive Report: Michael Fuller	<u>Emailed Date:</u>
Company Representative's Email Address: mfuller2@ameren.com	10/01/2013

Inspection Summary

Inspection Type	Location	ICC Analyst	Inspection Unit(s)	Man Day(s)	Inspection Date(s)	Contact(s)
Standard Inspection Plan Review- O and M	ICC Headquarters	Jim Watts	[ALL UNITS]	0	4/30/2013, 5/2/2013	N/A

Statement of Activities

On April 30 and May 2, 2013, Staff reviewed the O&M revisions received from Ameren on April 29, 2013. The review was performed at ICC Headquarters to determine compliance with applicable IL Adm. Codes and the Code of Federal Regulations adopted via IL Adm. Part 590. Staff's findings were recorded on the attached O&M checklist. The review identified 11 areas where Notices of Amendments (NOA's) will be issued where proposed procedures or processes will need to be amended.

ISSUE(S) FOUND:

NO ISSUES FOUND.

ISSUE(S) CORRECTED:

NO ISSUES CORRECTED.

NOTICE OF AMENDMENT(S) FOUND:

192.614(a) - Staff identified that during the review process the operator failed to place a period at the end of the sentence in # 3 of BORE 2.05. Staff requests the operator to make the necessary revisions to this section.

192.605(b) (2) - Review of the casing inspection procedures defined in CORR 2.19 established the requirement for the type of further testing is not defined in the "Note" section.

(3) Casings with less than 25 mV difference between the pipe-to-soil readings shall have an additional test for isolation performed and be reported to the Gas Supervisor for further analysis, unless the casing is filled.

Note: If the half cell has to be moved to perform both potential tests, casings with less than 200 mV difference between the pipe-to-soil and casing-to-soil readings shall have at least one additional test performed and be reported to the Corrosion Supervisor for additional analysis.

Staff requests the operator to include "test for isolation" in the notes section as it is defined in number 3 of this section.

192.605(b) (2) - Staff has concerns with the revision to 2.30 which does not require completion of a pipe inspection form on piping that is being abandoned. The information gathered may give the operator pertinent information on connected piping that is not being abandoned or is of the same vintage and coating type that is located in other parts of their system. Staff requests that this information should be retained when piping is exposed during the abandonment to aid in detecting issues with similar piping, materials or coatings.

192.605(b) - Review of revisions made to 2. C. (3) (d) in LEAK 2.05 indicate a pressure test is required on a segment of piping being reinstated or replaced. This section further indicates a test is not required on a segment of main or service piping that is being abandoned. Staff has no issue with the abandoned section but does want to know where the soap test of the cap, plug or fitting used to isolate the live facility is leak tested using leak detection solution. This section does not include the documentation

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of this test or indicate how or where it will be documented. Staff determined the records are required to be documented in 5 of the abandonment section of ABND 2.01. Staff requests that Ameren reference or define where and how this leak test shall be recorded and retained.

192.605(b) - Review of LEAK 2.05 dealing with abandonment of facilities states no pressure test is required if piping is being permanently disconnected. If a service or main is abandoned, the cap or isolation point on the live facility shall be tested to ensure no leakage is present. How / where will the leak test be recorded if not recorded here to document the leak test on the cap, plug or isolation point for the abandonment? Staff requests either a reference be added here or indicate where the leak test is to be documented.

192.615(a)(3)(i) - In 2 D. (5) of LEAK 2.05 Ameren allows the use of an FI or CGI with bar holes to be utilized in the verification method during a recheck to verify if below ground gas exists. In D of the Leak Recheck in the Gas Leak Case Field report, the form only allows a CGI to be used for verification of a below ground leak. Can an FI be used to determine if a below ground leak exists when performing a leak recheck or can only a CGI be utilized because there is no place to record the use of an FI.

192.13(c) - Review of revisions submitted for METER sections 3.21-3.26 do not include the provision for installing protector posts in the material lists if the meter set is prone to vehicular traffic or other types of damage. There is a requirement in METER 1 in 3 F (3) that requires the installation of guard posts or railings to protect from damage where exposed to vehicular traffic or other outside forces. Staff requests that the materials allowed to be used for protection shall be defined or referenced in each of the applicable metering sections. If these are a case by case design, then add a statement requiring the installer to contact engineering to design the required barrier to provide ample protection to protect the meter set against damage.

192.615(b)(1) - Staff's reviews of the forms referenced in INVE 4 utilized to document incident findings and maintain chain of custody, do not have form numbers or date of current edition. Staff suggests assigning form numbers to allow employees to ensure they are using the correct form and give it a date to ensure the current edition is being used.

192.615(a)(3)(iii) - Review of the revisions to INVE 2.20 detected an issue with a hot link in the current version of the O&M 5.1. The link indicates to review INCD 1 but when you click on it you are taken to INVE 1. Staff requests that the hot link be reviewed and corrected.

192.615(a)(1) - Review of Gas Leak Field Case reports revision log submitted determined the indicated revision to 2. A. (12) which was the addition of Job Order # does not appear to have been added. DOJM Order is still indicated rather than Job Order #. Staff requests Ameren to review and see what is correct.

192.13(c) - Review of MAIN 1, indicates that when main is installed with less than the required amount of cover, a warning barrier tape is utilized as a warning method to future excavators. Staff does not agree that this sole measure is sufficient to protect the piping. Warning barrier tape cannot withstand external loading and is not an effective stand alone damage prevention measure. Shallow installation locations should also be noted on company mapping utilized by locating and company personnel. Such a precaution will allow the locator to warn excavators of the shallow condition. Depending of the location of the shallow pipe additional measures may be required to prevent undue strains being exerted on the pipe. The procedure shall include a process to initiate an engineering review to ensure the pipe is adequately protected against strains and subsequent damage. This section needs further revisions or if protection of shallow facilities is covered elsewhere in the O&M, a reference needs to be added here.

NOA(S) CORRECTED:

NO NOAs CORRECTED.

NOTICE OF PROBABLE VIOLATION(S) FOUND:

NO NOPVs FOUND.

NOPV(S) CORRECTED:

NO NOPVs CORRECTED.